

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
DOCKET NO. 3:19-CV-00522-FDW-DSC**

SERIES 1 OF OXFORD INSURANCE
COMPANY NC, LLC,

Plaintiff,

v.

BUCKLEY LLP,

Defendant.

**DECLARATION OF
JAMES T. PARKINSON**

I, James T. Parkinson, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and would be competent to testify to the same if called upon to do so.

2. I am an American citizen and a lawyer licensed to practice law in the United States. I was first admitted to the bar in 1999. I am admitted to the bars of California and the District of Columbia.

3. In 2010, I joined the law firm Buckley LLP (“Buckley” or “the Firm”)¹ as a partner and was based in the Firm’s Washington, D.C. office. In January 2016, I became an equity-owning partner of the Firm.

4. In April 2014, Firm management approached me about the Firm’s desire to open an office in London, England and proposed that I move to London to head that office. After extensive discussions with both the Firm and my family, I agreed to move to London.

¹ At that time, Buckley was known as BuckleySandler LLP.

5. The Firm announced the opening of its London office, and that I was relocating to London to run it, in a press release dated September 8, 2014. A true and correct copy of that press release, which is available on Buckley's website, is attached hereto as Exhibit A.

6. In August 2014, I moved to London and opened the Firm's office here. I have worked here continuously ever since. From time to time, I travel back to the United States for various reasons, and on such trips I sometimes work out of an office in one of the Firm's U.S. offices. But my primary work location—and the place where I spend the vast majority of my working time—is the Firm's London office.

7. When I moved to London, I obtained a visa from the United Kingdom entitling me to live and work here. The visa was based on my employer's need for me to have a long term presence in London to operate the office here. The visa was initially valid for a period of three years, and has since been extended twice, each time for two years. The current extension expires in July 2021.

8. Because I do not have plans to return to the United States, I intend to apply next year for "Indefinite Leave to Remain," an immigration status that will allow me (and my family) to continue to live in the United Kingdom for an indefinite period of time, and which is the required first step to so-called "settled status" under the United Kingdom immigration regime. In spring 2019, I consulted with our United Kingdom immigration solicitor about pursuing that status, and I intend to file my application for Indefinite Leave to Remain early in 2020.

9. I practice U.S. law. I do not offer clients advice on English law, or that of any non-U.S. jurisdiction. Instead, I focus on offering services to clients that are based in London (and to a lesser extent, elsewhere in Europe, Africa, and Asia) who require advice about U.S. law. While such clients could, of course, hire lawyers based in the United States to provide such

advice, because I am based full-time in London, I can offer a much greater level of availability than competitors who are located an ocean away and must fly in and out of London or schedule conference calls with people in a different time-zone. In other words, fundamental to what I offer clients is that I am fully available in London because I live and work here.

10. I am a member of several professional and social clubs in London, including the Society for English and American Lawyers, the Fraud Lawyers Association, Transparency International UK (the U.K. national chapter of Transparency International), and the Royal Institute of International Affairs (also known as Chatham House). All of these organizations are based in London and primarily include members from the United Kingdom and events that take place in the United Kingdom. I am also a member of the International Bar Association, which is based in London.

11. I am married with two school-age children. My family moved with me to London in August 2014. We have resided in London ever since, in two different homes located in central London. We rent our home in London. We have not purchased a home in London due to the extremely high cost of real estate in London. We also rent a country home in Oxfordshire, approximately 40 miles from London. We own a car and keep significant personal property and household furnishings in London.

12. Both of my children have attended school full-time in London since September 2014.

13. I have a driver's license issued by the United Kingdom.

14. I have a bank account in the United Kingdom.

15. My doctors and dentist are in London.

16. I pay income taxes to the United Kingdom. My wife and I also pay a “Council Tax,” which is a tax based on our residence being in central London.

17. I am not eligible to vote in the United Kingdom.

18. After more than five years of living in London, I consider myself a resident of London and the United Kingdom. I intend to continue living in London for the foreseeable future, and I have no plans to reside anywhere else.

19. I do, however, continue to maintain ties to the United States.

20. My wife and I continue to own a house in the District of Columbia where we lived before we moved to London. When I first moved to London, I decided not to sell our house in the District of Columbia because I was not sure whether I would stay in the United Kingdom longer than my initial three-year visa. Even though I now intend to continue living in the United Kingdom, the house in the District of Columbia is still useful when my family vacations in the United States, and when I visit Buckley’s Washington, D.C. office for work. I also partially own a small vacation property in Pennsylvania.

21. I maintain memberships in several U.S.-based social clubs, including in New York City, Washington D.C., and Arizona.

22. I maintain my District of Columbia driver’s license.

23. My family travels to the United States every summer, and sometimes around the Christmas holidays as well, to visit friends and family and so that I can spend some time in the Firm’s offices with my colleagues who do not see me frequently throughout the year.

24. I am eligible to vote in American elections and am registered to vote in the District of Columbia. Since moving to London, I have continued to vote in federal elections in

the United States by absentee ballot, but I do not believe that I have voted in state or local elections unless they were held in conjunction with federal elections.

25. As a citizen of the United States, I also pay income taxes in the United States, to both the federal government and a number of states and the District of Columbia.² Because I live in London, I have been eligible for an extension of the deadline to file my United States tax returns under a provision of the tax code for “United States citizens or residents whose tax homes and abodes, in a real and substantial sense, are outside the United States and Puerto Rico.” 26 C.F.R. § 1.6081-5(a)(5). All of my tax decisions are made in consultation with personal tax advisors based in London.

26. Despite my continuing ties to the United States, I am now at home in London and have no plans to live anywhere else for the foreseeable future.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 30, 2019 in London, England.



James T. Parkinson

² All Firm partners pay taxes to various states, including New York and California, based on the fact that Buckley transacts business in those jurisdictions.

EXHIBIT A

BUCKLEY

Press Release

Buckley Sandler Establishes International Presence With Opening of London Office

September 8, 2014

WASHINGTON, DC / LONDON, ENGLAND (September 8, 2014) – [Buckley Sandler LLP](#), a leading financial services and criminal & civil enforcement defense law firm, announced today the opening of its first international office, located in London. [James T. Parkinson](#) has relocated from the firm's [Washington, DC office](#) to be its [London](#) partner-in-residence, enabling the firm to better assist its clients with their global [regulatory, litigation, enforcement, financial crimes, FCPA, digital commerce, privacy/data security](#) and [anti-money laundering](#) needs.

"As the enforcement, regulatory and litigation challenges facing our clients globalize, it has become apparent that we need to be in London to enable us to meet our clients' global needs," explained Buckley Sandler Chairman and Executive Partner [Andrew L. Sandler](#). "Jamie's move to London and our evolving strategic partnerships with global law firms with complementary practices are important steps in enabling the firm to assist clients in their global challenges and expand our global financial crimes practice."

"I am excited to be relocating to London to better enable the firm to meet the global needs of our clients and expand our global financial crimes practice. Our new London presence is a significant part of Buckley Sandler's overall development of a strong capability to advise clients on comprehensive solutions to regulatory and enforcement problems on a global basis," noted Parkinson. "This is an important initiative for the firm and a welcome professional opportunity for me."

Sandler added, "With Jamie in London and the firm expanding our strategic partnerships, we are now able to respond immediately to client needs on a global basis."

Buckley Sandler's London address: 16 St Martin's Le Grand, London EC1A 4EN.

With more than 150 lawyers in Washington, New York, Los Angeles, Chicago and London, Buckley Sandler provides best-in-class legal counsel to meet the challenges of its financial services industry and other corporate and individual clients across the full range of government enforcement actions, complex and class action litigation and transactional, regulatory and public policy issues. Operating in the United Kingdom as Buckley Sandler International LLP, a limited liability partnership incorporated in England and Wales, for the practice of US law. The Firm represents numerous national and international leading financial services institutions.

Online: www.buckleyfirm.com; Twitter: https://twitter.com/Buckley_Sandler; InfoBytes Blog: <http://www.infobytesblog.com>.

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